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Agency Secretary

# Air Resources Board

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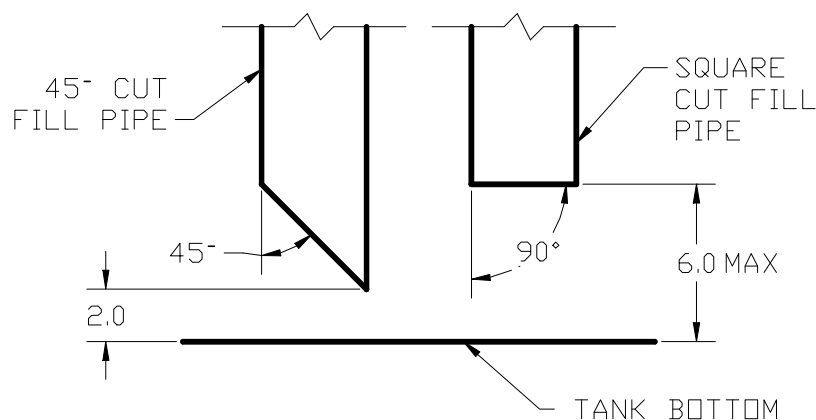
October 2, 2001

To: All Vapor Recovery Manufacturers/Stakeholders:

The California Air Resources Board (CARB) staff is requesting comments on the need to specify the cut angle of the drop tube fill pipe when installed in storage tanks used at gasoline dispensing facilities (GDF's).

Health & Safety (H&S) Code Section 41950(d) defines a "submerged fill pipe" as any fill pipe which has its discharge opening entirely submerged when the liquid level is six inches above the bottom of the tank. We have been informed that Gasoline Storage Tank manufacturers typically specify drop tube fill pipes should be a minimum of four inches from the bottom of the tank for those tanks with up to 10 feet in diameter or a minimum of six inches from the bottom for tanks greater than 10 feet in diameter.

A number of manufacturers of Phase I equipment have installation manuals that either state or show the drop tube fill pipe cut at an angle of 45-degrees prior to installation into the tank. For tanks with less than 10 feet in diameter, a four inch diameter drop tube cut at a 45-degree



angle means it would be only two inches from the tank bottom in order to comply with H&S Code 41950(d). We have been informed that this could void the warranty on the tank being used at the installation of the Phase I system, as the distance to the bottom of the tank would be less than the four to six inches clearance that tank manufacturers require.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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October 2, 2001  
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Based on our discussions with a number of stakeholders, no stakeholders were able to articulate the basis of the 45-degree angle cut. Therefore, we are considering not specifying the 45-degree angle cut. This should resolve any warranty issues associated with the position of the drop tube fill pipe and still be consistent with H&S Code Section 41950(d).

We are seeking your comments, suggestions, and input on the proposal of not specifying the 45-degree angle cut. We would like to receive your comments especially if they pertain to the basis of the 45-degree angle cut. If you wish to share test information or would like to provide a written response, please provide them by no later than October 30, 2001. A copy of this letter, as well as written comments, and our responses will be posted on the CARB Vapor Recovery web site at [www.arb.ca.gov/vapor/vapor.htm](http://www.arb.ca.gov/vapor/vapor.htm).

If you have questions or need additional information, please contact Paul Marzilli at (916) 445-7431 or by email at [pmarzill@arb.ca.gov](mailto:pmarzill@arb.ca.gov), or contact Laura McKinney at (916) 327-0900.

Sincerely,

**Signed Copy on File**

George Lew, Chief  
Engineering and Certification Branch  
Monitoring and Laboratory Division

cc: Rosa Salcedo, San Diego County APCD  
Mark Yepez, Office of State Marshall  
Dan Reiswig, Department of Food and Agriculture  
Larry McLune, P.E., Department of Industrial Relations  
Elizabeth Haven, State Water Resources Control Board